

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JONATHAN EDWARD WORKMAN,)	CASE NO.: 1:19-CV-00862
)	
Plaintiff,)	JUDGE: DAN AARON POLSTER
)	
vs.)	<u>MOTION FOR EXTENSION OF TIME</u>
)	<u>AND FOR REFERRAL OF CASE TO</u>
CITY OF CHARDON, et al.,)	<u>MEDIATION</u>
)	
Defendants)	

Now come Defendants who hereby respectfully request an extension of time of 45 days, through and including September 30, 2019, within which to respond to Plaintiff's Complaint, Motion for Summary Judgment and Motion for Preliminary Injunction as well as the Amicus Brief filed in this matter so as to permit mediation of the case to take place. Defendants further request referral of this matter to the Magistrate Judge for mediation.

Plaintiff filed his Complaint on April 17, 2019 challenging the constitutionality of Chardon Codified Ordinance 509.12 prohibiting begging in public places. On May 16, 2019, Plaintiff filed a Motion for Summary Judgment and on June 25, 2019 he filed a Motion for Preliminary Injunction. The ACLU filed an Amicus Brief in Support of Plaintiff's case on June 28, 2019. After some delay, summonses were issued on July 22, 2019 and served on July 26, 2019. The undersigned was retained on August 13, 2019 and responses to the foregoing are due on August 16, 2019.

Plaintiff is proceeding pro se. Defendants are interested in attempting to mediate a resolution of this matter and believe that referral of the case to the Magistrate Judge for that purpose would be beneficial.

In view of the foregoing, Defendants respectfully request that they be granted a 45-day extension through and including September 30, 2019 within which to respond to the foregoing pleadings and motions and that the case be referred to the Magistrate Judge for mediation as soon as possible.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/James A. Climer

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CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2019, a copy of the foregoing Motion for Extension of Time and For Referral of Case to Mediation was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system and to:

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